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The Honorable Catherine C. Blake  
United States District Judge  
U. S. District Court for the District of Maryland  
U.S. Courthouse  
101 West Lombard Street  
Baltimore, MD 21201

**RE: *American Sugar Refining Co., Inc. v. M/V ALIANA*  
*PRINCESS*; Civil Action No.: CCB-03-CV-329**

Dear Judge Blake:

This letter is a joint request for further extension of deadlines under the Scheduling Order. I know that we are beginning to sound like a broken record, but we must come back to you again to request more time to settle this case.

Again, under normal circumstances, we would have had time to respond to questions and provide documentation and feedback to Defendant's counsel, but because this case was commenced with the arrest of the vessel, we were involved in litigation simultaneously with the event.

Counsel are in agreement that the case can be resolved, but as some of the damage issues require fairly extensive documentation, response to Defendant's counsel's requests have been time consuming. On April 5, Plaintiff's counsel mailed extensive documentation to Defendant's counsel, and anticipates that he will need further time to review the documents and respond with any questions or further document requests. Counsel are putting forth their best efforts to reach a resolution in this case, but due to the schedules of counsel and their clients, we believe it will be

\*Admitted in the District of Columbia and Maryland

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at least 90 days before a settlement can be reached. In that regard, we would suggest to the Court that the Scheduling Order be suspended and that counsel provide a joint status report every 60 days.

If that is not acceptable to the Court, we would request in the alternative that the dates approved in the Court's paperless Order of February 24, 2004, be moved forward for 90 days as follows:

1. Plaintiff's Rule 26(a)(2) Disclosures re: experts – July 6, 2004;
2. Defendant's Rule 26(a)(2) Disclosures re: experts – August 6, 2004;
3. Plaintiff's Rebuttal Rule 26(a)(2) Disclosures re: experts – August 19, 2004;
4. Rule 26(a)(2) Supplementation of Disclosures and responses – August 19, 2004;
5. Discovery deadline; submission of Status Report – September 9, 2004;
6. Request for Admission – September 16, 2004; and
7. Dispositive Pretrial Motions deadline – October 6, 2004.

All other provisions to the Court's Scheduling Order remain the same. Thank you for your consideration to these requests.

Very truly yours,  
/S/  
James D. Skeen

cc: Robert B. Hopkins, Esq.  
Charles A. Diorio, Esq.  
Jeffrey J. Asperger, Esq.